

EXHIBIT B

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Attorneys for Plaintiff
Rearden LLC and Rearden Mova LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

REARDEN LLC, REARDEN MOVA LLC,
California limited liability companies,

Plaintiffs,

v.

THE WALT DISNEY COMPANY, a Delaware
corporation, WALT DISNEY MOTION
PICTURES GROUP, INC., a California
corporation, BUENA VISTA HOME
ENTERTAINMENT, INC. a California
corporation, MARVEL STUDIOS, LLC, a
Delaware limited liability company,
MANDEVILLE FILMS, INC., a California
corporation,

Defendants.

No. 3:17-CV-04006-JST

**PLAINTIFFS' SECOND
INTERROGATORIES TO
DEFENDANT MARVEL STUDIOS,
LLC**

Pursuant to ecf No. 166 and Rule 33 of the Federal Rules of Civil Procedure, plaintiffs Rearden LLC and Rearden Mova LLC hereby serve the following interrogatories on defendant The Walt Disney Company.

INSTRUCTIONS

A. These Interrogatories seek complete and full responses as of the date the responses are executed, and which reflect or embody all relevant information or documentation known to YOU and/or within YOUR custody and/or control as of that date. Should YOU later learn that any response was incomplete, incorrect when made, or though correct when made is no longer accurate, the response shall be timely supplemented as required by Rule 26 of the Federal Rules of Civil Procedure.

B. In responding to the following Interrogatories, furnish all information available, including information in the possession, custody or control of DISNEY and its representatives, not merely information within the personal knowledge of the person responding to the Interrogatories.

C. All responses and objections shall be made in writing and delivered to the offices of Hagens Berman Sobol Shapiro LLP, 1301 Second Ave., Ste. 2000, Seattle, Washington, 98101.

DEFINITIONS

A. ENTITY shall mean any organization, firm, corporation, partnership, sole proprietorship, or other legal entity that is not a natural person. The acts “of an ENTITY” include the acts of owners, directors, officers, members, employees, agents, attorneys, representatives, contractors, and any other person acting on the ENTITY’s behalf.

B. When referring to an ENTITY, “to IDENTIFY” means to give the ENTITY’s full legal name, type of entity (e.g., corporation, LLC, etc.), nation and state or province under which the ENTITY is organized or principally registered, any fictitious names or dbas under which the ENTITY is doing business, present or last known address of the ENTITY’s headquarters, and the ENTITY’s primary telephone number. With respect to a person, “to IDENTIFY” means to give the person’s full name, employer, job title, and last known address and telephone number. With respect

1 to a contract, “to IDENTIFY” means to state the parties to the contract, its signatories, and the date
2 of the contract.

3 C. MARVEL, YOU, or YOUR as used herein means Marvel Studios, LLC and all past
4 or present divisions, and parents, subsidiaries, or affiliates of Marvel, all past or present joint
5 ventures, partnerships, and limited partnerships of which any of the foregoing entities is a joint
6 venture or a limited or general partner, including but not limited to Assembled Productions II and
7 Infinity Productions, and all past or present owners, directors, officers, members, employees, agents,
8 attorneys, representatives, contractors, and any other persons under the control of any of the
9 foregoing entities.

10 D. ACCUSED FILMS as used herein means *Guardians of the Galaxy* (2014) and
11 *Avengers: Age of Ultron* (2015).

12 E. MARVEL DEPOSITION as used herein means the June 19, 2019 Deposition of The
13 Walt Disney Company pursuant to Fed. R. Civ. P. 30(b)(6).

14 **INTERROGATORIES**

15 **INTERROGATORY NO. 1:**

16 IDENTIFY the ENTITY that controls physical document repositories of MARVEL
17 documents relating to the ACCUSED FILMS, and for each identify the custodian.

18 **RESPONSE:**

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20 **INTERROGATORY NO. 2:**

21 IDENTIFY all employees and/or independent contractors who worked for MARVEL on
22 visual effects for the Thanos character in *Guardians of the Galaxy*, including but not limited to
23 persons who approved the appearance of the Thanos character.

24 **RESPONSE:**

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26 **INTERROGATORY NO. 3:**

1 IDENTIFY all employees and/or independent contractors who worked for MARVEL on
2 visual effects for the Thanos character in *Avengers: Age of Ultron*, including but not limited to
3 persons who approved the appearance of the Thanos character.

4 **RESPONSE:**

5
6 DATED: July 31, 2019

HAGENS BERMAN SOBOL SHAPIRO LLP

7 By /s/ Steve Berman
8 Steve Berman

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